

1 JASON M. FRIERSON, Nevada Bar No. 7709

2 United States Attorney

3 District of Nevada

4 RYAN LU, Oregon Bar No. #105902

5 Special Assistant United States Attorney

6 Office of Program Litigation, Office 7

7 Office of the General Counsel

8 Social Security Administration

9 6401 Security Boulevard

10 Baltimore, MD 21235

11 Telephone: (206) 615-2034

12 ryan.lu@ssa.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 DOLLY STODDART,

17 Plaintiff,

18 v.

19 KILOLO KIJAKAZI,

20 Acting Commissioner of Social Security,

21 Defendant.

22) Case No. 2:22-cv-01119-DJA

23) **UNOPPOSED MOTION FOR**
24) **EXTENSION OF TIME**
25) **(THIRD REQUEST)**

26 Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully
27 requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal
28 and/or Remand (Dkt. No. 21), currently due on February 27, 2023, by 14 days, through and including
29 March 13, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's
30 scheduling order (Dkt. No. 26) be extended accordingly.

31 This is Defendant's third request for an extension of time. Good cause exists for this extension.

32 On January 27, 2023, this case was reassigned to Defendant's lead attorney of record from another

33 attorney at Social Security's Office of the General Counsel. On January 30, 2023, Defendant's counsel

1 moved for a 28-day extension for the purpose of exploring settlement options in this case and consult
2 and negotiate with Plaintiff's counsel, as required. The Court granted Defendant's motion for
3 extension. Dkt. No. 26. However, Defendant's counsel is currently still in the process of exploring
4 settlement options and needs more time to receive a response from the client agency. If settlement is
5 not possible, Defendant's counsel will need time to draft and file Defendant's responsive brief. This
6 request is made in good faith and with no intention to unduly delay the proceedings, and counsel
7 apologizes for the inconvenience this delay has caused the Court and Plaintiff.

8 On February 24, 2023, counsel for Defendant conferred with Plaintiff's attorney, who has no
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond
11 to Plaintiff's Motion for Reversal and Remand, through and including March 13, 2023.

12
13 Dated: February 24, 2023

Respectfully submitted,

14 JASON M. FRIERSON
15 United States Attorney

16 */s/ Ryan Lu*
17 RYAN LU
18 Special Assistant United States Attorney

19
20 IT IS SO ORDERED:
21

22 
23 UNITED STATES MAGISTRATE JUDGE

24
25 DATED: February 27, 2023

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (THIRD REQUEST)** to be served upon the following by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Gerald Morris Welt
Gerald M. Welt, Cht.
411 E. Bonneville Ave., #505
Las Vegas, NV 89101
702-382-2030
Fax: 702-684-5157
Email: gmwesq@weltlaw.com

Marc V. Kalagian
Law Offices of Lawrence D. Rohlfing, Inc., CPC
12631 East Imperial Highway
Suite C115
Santa Fe Springs, CA 90670
562-273-3702
Fax: 562-868-5491
Email: marc.kalagian@rksslaw.com

Dated: February 24, 2023

/s/ Ryan Lu
RYAN LU
Special Assistant United States Attorney